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and Brian Butcher
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7

8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**
10

11 MOHAMAD ALI SAID, an individual,
12 Plaintiff,

13 v.

14 COUNTY OF SAN DIEGO; DEPUTY
SHERIFF PATRICK LOPATOSKY;
15 DEPUTY SHERIFF BRIAN BUTCHER;
DEPUTY SHERIFF LEE SCOTT; and
16 DOES 1 - 50, inclusive,
17 Defendants.
18

No. 12-cv-2437-GPC(RBB)

DECLARATION OF HANAN HARB IN
SUPPORT OF DEFENDANTS' MOTION
FOR PARTIAL SUMMARY JUDGMENT

Date: April 10, 2013
Time: 1:30P.M.
Dept.: 2D- Courtroom of the
Honorable Gonzalo P. Curiel
Trial Date: TBD

19 I, HANAN HARB, declare as follows:

20 1. I am employed by the County of San Diego as the Communications
21 Coordinator for the San Diego County Sheriff's Department. I make this declaration of
22 my own personal knowledge. If called upon to testify to the matter stated in this
23 declaration, I could and would competently do so.

24 2. As part of my job duties as the Communications Coordinator I act
25 as the custodian of records for the 9-1-1 audio recordings and the computer aided
26 dispatch ("CAD") records maintained by the Sheriff's Department.

27 3. A CAD "event number" is generated for 911 calls that are received by the
28 Sheriff's Department that require law enforcement services. The CAD event number

12-cv-2437-GPC(RBB)

1 assigned to the call is linked to the CAD data associated with that call, and also to any
2 deputies' reports that are later generated in connection with the call. The 9-1-1 calls are
3 recorded and maintained electronically in a system which can be queried in a number of
4 ways, including by the CAD event number.

5 4. As a part of the litigation of *Said v. County of San Diego*, Case No. 12-cv-
6 2437-GPC(RBB), I was asked by the County Counsel's office to query the electronic
7 recording system and obtain the 9-1-1 audio for CAD event number S9746332, which
8 was the event number assigned to a 9-1-1 call made on January 24, 2012, at 5:51pm
9 originating from a reported location of 3755 El Canto Dr., and later linked to the reports
10 generated by Deputies Brian Butcher, Patrick Lopatosky, and Scott Lee in connection
11 with the arrest of an individual named Mohamed Said. I queried the electronic system,
12 retrieved the audio recorded 9-1-1 call, and copied it as a .wav file onto a cd. Attached
13 hereto as Exhibit A is a true and correct copy of that recording.

14 I declare under penalty of perjury under the laws of the United States of America
15 that the foregoing is true and correct.

16 Executed in San Diego, California, this 17th day of February 2015.

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18 
19 HANAN HARB
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Exhibit A

[9-1-1 Call Audio Recording Will Be Physically Lodged
with the Court]